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TROUTMAN SANDERS LLP

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on January 5, 2016 at 10:00 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 255 East Temple Street, Los Angeles, CA 90012, in Courtroom 580, Defendant and Counterclaimant Empire Distribution, Inc. ("Empire") will and hereby does move to compel the production of documents by Plaintiffs and Counter-Defendants Twentieth Century Fox Television, a division of Twentieth Century Fox Film Corporation, and Fox Broadcasting Company (collectively "Fox").

Empire's motion is made on the grounds that Fox has failed and refused to produce highly relevant documents relating to the parties' claims, defenses and subject matter of this litigation.

This motion is made following the conference of counsel pursuant to Local Rule 37-1, which took place on October 5, 2015 and on several dates thereafter.

Empire's motion is based upon the parties' Joint Stipulation pursuant to Local Rule 37-2 and the exhibits attached thereto, all pleadings and papers on file in this action and upon such other matters and arguments as may be presented to the Court prior to and at the time of the hearing.

Dated: December 3, 2015	Respectfully submitted,
	TROUTMAN SANDERS LLP

By: /s/ Peter N. Villar
Paul L. Gale
Peter N. Villar
John M. Bowler
Michael D. Hobbs
Lindsay Mitchell Henner

Attorneys for Defendant-Counterclaimant Empire Distribution Inc.

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